

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 2:12-md-02323-AB  
MDL No. 2323

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Civil Action No. 2:14-cv-00029-AB

Plaintiffs,

v.

National Football League and  
NFL Properties, LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

**MEMORANDUM OF LAW IN SUPPORT OF  
MOVANTS' MOTION FOR LEAVE TO FILE A REPLY  
IN SUPPORT OF MDL DOCKET NO. 6169  
(MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY)**

On September 13, 2014, Movants filed a motion for leave to conduct limited discovery for purposes of preparing for this Court's November 19, 2014 fairness hearing. Dkt. No. 6169. On October 2, 2014, the NFL and Class Counsel filed oppositions. Dkt. Nos. 6183, 6185.

Movants respectfully request leave to file a reply memorandum so that Movants may respond to and rebut the contentions raised in the oppositions to Movants' Motion for Leave to Conduct Limited Discovery. A reply is necessary because of the importance of the matter and to correct the misstatements of law and fact in Class Counsel's and the NFL's oppositions. The interests of justice therefore favor granting leave to file a reply. Movants' request for leave to

file a reply memorandum is also timely because it will not delay the Court's consideration of any pending motion and because it is filed within eight business days after the oppositions were filed.

Dated: October 13, 2014

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